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September 3, 2019

**Via ECF**

Honorable Judge Sandra Feuerstein  
U.S. District Court  
Eastern District of New York  
100 Federal Plaza  
Central Islip, NY 11722

**Re: Weitzman v. Long Beach City School District, et al.  
Docket No. 16-CV-3544**

Dear Judge Feuerstein:

I have been provided with a copy of a letter and application from Stagg Wabnik Law Group, attorneys for the plaintiff Lisa Weitzman in the above-referenced matter.

While this office does not represent any parties in that particular action, it appears from Ms. Wabnik's letter that she is seeking a stay of discovery which would effect the action in which I represent the four plaintiff under Docket No. 2-17-CV-453.

Your Honor has recently reopened my client's cases after a stay of almost two years. The parties in my action have commenced discovery and are attempting in earnest to complete discovery before Your Honor's deadline of February 2020. There is a great deal of ground to be covered in this case. In addition to the extraordinary number of documents which have been requested, the depositions of the numerous parties in the action, there are also at least twelve to fifteen non-party depositions which may need to be conducted.

My clients have been waiting a significant time to even just start discovery in their cases. The pending motion and appeal by Ms. Weitzman in her case which may or may not reverse the decision by the State Hearing Officer should not be the basis for yet another extended stay of my clients' matter.

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While the undersigned has no position with regard to extending Ms. Weitzman's time to reopen her case, we respectfully request that this Court not stay any discovery in the related case being prosecuted by this office.

I thank the Court for its attention to this matter.

Respectfully submitted,

A handwritten signature in black ink, consisting of a stylized 'G' followed by a series of loops and a final horizontal stroke.

GERARD N. MISK

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